

# EXHIBIT “G”

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

EVELYN CINTRON, :  
Plaintiff :  
 :  
v. :  
CITY OF PHILADELPHIA; THE :  
PHILADELPHIA POLICE ATHLETIC :  
LEAGUE and JOSEPH SULLIVAN, :  
Defendants: NO. 19-4078

- - -

Friday, November 15, 2024

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Oral deposition of GENE CASTELLANO,  
held in the offices of Magna Legal Services, 1635  
Market Street, 8th Floor, Philadelphia, Pennsylvania  
19102, at 1:09 p.m., on the above date, before  
GIANNA IACONELLI, a Court Reporter and Notary Public  
of the Commonwealth of Pennsylvania.

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1 I N D E X

2 TESTIMONY OF: PAGE NO.  
3 GENE CASTELLANO

4 BY: MS. RIGAMIDEN-DELON 5  
5 BY: MR. WEHR 58  
6 BY: MR. GOLDEN 59

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1           A.    No.  I know they go back to 2016 because  
2   of this.

3           Q.    Well, yeah.  We know that.  Okay.

4                   What about destruction of documents?

5   Is there any written policy that you know of?

6           MR. GOLDEN:  Objection.

7           Go ahead.

8           THE WITNESS:  I don't know if there's a  
9       written policy.  I know the practice is not to  
10      destroy anything.

11  BY MS. RIGAMIDEN-DELEON:

12          Q.    Okay.  So that's the practice of the  
13  board?

14          A.    That's the practice of the staff.

15          Q.    Okay.  Of the civilian employees?

16          A.    Yes, ma'am.

17          Q.    Okay.  So any documents generated related  
18  to PAL functioning that's generated by the PAL unit,  
19  the police unit, does the PAL directive govern those  
20  documents as well?

21          A.    No, no.

22          Q.    Okay.

23          A.    We don't have access to any of the police  
24  documents.  They even maintain a separate printer so

1 that they could print documents and we don't see  
2 them.

3 Q. Oh, okay. All right. So do you know if  
4 the City provided PAL with any policies or  
5 procedures relative to reporting problems to the  
6 police department that are related to the actions of  
7 the PAL commander?

8 A. No.

9 Q. Any policies or procedures provided to PAL  
10 by the police department or the City governing,  
11 reporting problems related to a PAL unit officer?

12 A. No.

13 Q. Okay. Any policies or procedures drafted  
14 by the City or police department given to PAL  
15 relating to hiring or placement of police officers  
16 in PAL sites?

17 A. No.

18 Q. Did the board in 2016 through 2019, did  
19 they ever make recommendations to the commanding  
20 officer related to what officers they wanted in  
21 those PAL sites?

22 A. Not that I'm aware of, no.

23 Q. Okay.

24 MS. RIGAMIDEN-DELEON: Can we have a

1 moment?

2 MR. GOLDEN: Absolutely.

3 (Recess taken from 2:13 p.m. to 2:18  
4 p.m.)

5 BY MS. RIGAMIDEN-DELEON:

6 Q. Can you describe the relationship, how it  
7 existed between PAL and the police department from  
8 2016 to 2019?

9 A. Mhm.

10 Q. How did that work?

11 A. So -- and I would say it's the same way it  
12 exists now.

13 Q. Okay.

14 A. The officers' salaries and benefits are  
15 paid by the City, and they are Paramilitary  
16 Organization commanding officer. Everything else is  
17 handled by the 501(c)(3). We rent the buildings, we  
18 buy the basketballs, we buy the T shirts. We assist  
19 in some programming that may differ from center to  
20 center.

21 Is that the description you're  
22 looking for?

23 Q. Yeah. I guess. That's --

24 A. That's how it works.